



REILLY TAR & CHEMICAL CORPORATION

TELEPHONE 317/638-7531
CABLE RETAR INDIANAPOLIS
TELEX 27-404



1510 MARKET SQUARE CENTER
151 NORTH DELAWARE STREET
INDIANAPOLIS, INDIANA 46204

May 3, 1984

Mr. Jay Heffern
Associate Director
Minnesota Pollution Control Agency
1935 West County Road B2
Roseville, Minnesota 55113-2785

Dear Jay:

As discussed, we are attaching a revised version of Reilly's Remedial Action Plan to properly and adequately resolve the St. Louis Park contamination problem.

This Plan does follow our February 1 proposal, in that it is based on ERT's analysis of the actions necessary to meet the MPCA objectives and water criteria. But, it does contain some further concessions on Reilly's part and is reformulated in the manner that the City has discussed with Mr. Hansel.

I will be in touch to arrange an immediate meeting or meetings, to conclude the settlement negotiations.

Very truly yours,

REILLY TAR & CHEMICAL
CORPORATION

C. F. Lesh
Executive Vice President

CFL:skb
Attachment

cc: Mr. James Brimeyer
✓ Mr. Paul Bitter

Item	Description	Reilly				St. Louis Park		
		Time	Capital	Annual	Annual Average	Capital	Annual	Average
B. Prairie du Chien-Jordan	Reilly will provide \$450,000 in 25 years to allow for the possibility of SLP15 continuing to require GAC treatment beyond 50 years (i.e. life-time of the replacement GAC plant provided in item I.B). This amount is half of that required, calculated as described in Item IX.A. above.	25	450	--	--	--	--	--
	No other contingencies are required for the Prairie du Chien-Jordan because the gradient control well system and pumping W23 should purge most of the aquifer of significant contamination within a few decades.							
C. W23	City will pay for operating the pumpout well at W23 beyond 10 years if necessary.	11- 25	--	--	--	--	24	40.0
D. St. Peter	Reilly will provide \$100,000 in 25 years to allow for the possibility of a gradient control well(s) in the St. Peter. This represents approximately half the cost of a \$100,000 system (1984) dollars) assuming 3 percent per year inflation. This contingency is provided for in the future because of slow contaminant transport in and limited current use of this aquifer.	25	100	--	--	--	--	--
E. Multi-Aquifer Wells	Reilly will provide \$20,000 for sealing any leaking multi-aquifer well(s) identified as a result of item VIII that require sealing. This amount should cover 1 or 2 of the 8 wells to be explored. This number of wells should be adequate since all 8 are not expected to be leaking significantly and all 8 are within the capture zone of the SLP4 gradient control well.	0	20	--	--	--	--	--

em	Description	Reilly				St. Louis Park		
		Time	Capital	Annual	Annual Average	Capital	Annual	Average
Gradient Control	Reilly will pay for installing two 100 gpm gradient control wells (one each in the Drift and Platteville) with ozone treatment for storm sewer disposal. Reilly will pay for the first 3 years of operation, with city to pay for operation thereafter. Reilly will pay for replacement in 25 years.	0	60	--	--	--	--	--
		25	126	--	--	--	--	--
		0-3	--	30	30.9	--	--	--
		4-25	--	--	--	--	30	45.5
Monitoring	Reilly will pay for installing new or reconstructed monitoring wells. City will pay for sampling and analysis. Well installation and monitoring per MPCA specifications within the cost limitations shown. Reilly will pay for replacement in 25 years.	0	40	--	--	--	--	--
		25	84	--	--	--	--	--
		0-25	--	--	--	--	10	14.6
III. MULTI-AQUIFER WELLS								
	Reilly will pay the cost of exploring the 8 suspected leaching wells specified by the MPCA (see also contingency item IX.E).	0	25	--	--	--	--	--
CONTINGENCIES								
Mt. Simon-Hinckley	Reilly will provide \$540,000 in 25 years to allow for the possibility of SLP11 requiring GAC treatment at some time in the future (estimated to be about 40 years, if ever). This amount is half of that required to install a GAC plant in 40 years and replace it 25 years later (at a cost of \$426,000 in 1984 dollars) assuming annual rates of 3 percent inflation and 5 percent for investment return over this period. Half of the amount is provided to account for the distinct possibility that this contingency will not occur.	25	540	--	--	--	--	--

Item	Description	Reilly				St. Louis Park		
		Time	Capital	Annual	Annual Average	Capital	Annual	Average
C. Monitoring	City will pay monitoring costs per MPCA plan.	0-25	--	--	--	--	10.8	10.8
VI ST. PETER								
A. Source Control	No action required at this time (see contingency item IX.D).							
B. Gradient Control	No action required at this time (see contingency item IX.D).							
C. Monitoring	Reilly will pay for the installation of 5 new or reconstructed monitoring wells. City will pay for annual analyses of SLP3 (GCMS) and these 5 wells (HPLC) for 10 years, with biannual analyses thereafter.	0	50	--	--	--	--	--
		0-10	--	--	--	--	2.1	2.1
		11-25	--	--	--	--	1.1	1.1
VII. DRIFT-PLATTEVILLE (AND THE SITE)								
A. Source Control	Reilly will pay for:							
	1) Sanitary sewer disposal of peat dewatering effluent during construction of Hwy. 7/La. Ave. Ext. Intersection (30 million gallons total).	0	24	--	--	--	--	--
	2) Fencing off exposed swamp areas (2,000 l.f.).	0	10	--	--	--	--	--
	3) Shallow borings to better define the limits of soil contamination south of the site (15 borings).	0	30	--	--	--	--	--
	4) Legal and administrative expenses associated with deed restrictions in the site area.	0	20	--	--	--	--	--

Item	Description	Reilly			St. Louis Park			
		Time	Capital	Annual	Annual Average	Capital	Annual	Annual Average
III. MT. SIMON-HINCKLEY								
A. Source Control	No action required. See contingency item IX.A.							
B. Gradient Control	No action required. See contingency item IX.A.							
C. Monitoring	Reilly will pay for annual GCMS monitoring of a composite sample of SLP 11, 12 & 17 for 25 years.	0-25	--	0.6	0.6	--	--	--
IV. IRONTON-GALESVILLE								
A. Source Control	No action required. Aquifer is not used for potable supply and contaminants travel very, very slowly.							
B. Gradient Control	No action required. Aquifer is not used for potable supply and contaminants travel very, very slowly.							
C. Monitoring	Reilly will pay for HPLC analyses of W38 and W105 (if applicable) once every 5 years for 25 years.	0-25	--	0.12	0.12	--	--	--
V. PRAIRIE DU CHIEN-JORDAN								
A. Source Control	Pump W23 at 50 gpm (see item II.A).							
B. Gradient Control	Reilly will pay for connecting SLP-4 to a storm sewer so it can serve as a gradient well. Reilly will pay OAM for 10 years to pump SLP4 at 500 gpm. City will pay OAM thereafter. Gradient control in vicinity of W70 is unnecessary. Only a small area of contamination will escape the capture area of SLP4 and these contaminants should not adversely affect any present or future users due to dispersion and dilution.	0	20	--	--	--	--	--
		0-10	--	14	16	--	--	--
		11-25	--	--	--	--	14	23.3
C. Monitoring	City will pay monitoring costs per MPCA plan.	0-25	--	--	--	--	10.8	10.8

REILLY TAR & CHEMICAL CORPORATION
ST. LOUIS PARK REMEDIAL ACTION PROPOSAL
May 3, 1984

Item	Description	Reilly				St. Louis Park		
		Time	Capital	Annual	Annual Average	Capital	Annual	Annual Average
I. DRINKING WATER								
A. Criteria	28 ng/l for carcinogenic PAH 300 ng/l for noncarcinogenic PAH							
B. Treatment	Reilly will pay for installation of a GAC treatment plant at SLP 15, pay for replacing it in 25 years, and pay for the first 3 years of operation. City will pay for operation after 3 years. Costs shown are based on Calgon's estimates, since CH2M Hill's design is overly conservative.	0 25 0-3 4-25	426 892 -- --	-- -- 28.2 --	-- -- 29.1 --	-- -- -- --	-- -- -- 28.2	-- -- -- 42.7
C. Monitoring	Reilly will pay for the first 3 years of monitoring, with city paying thereafter. Monitoring costs are based on the plan outlined in ERT's 12/6/83 recommendations table. This provides for 4 feed and 15 effluent samples annually during the first two carbon cycles (6 years) and 4 feed and 10 effluent samples annually thereafter, all for HPLC analysis.	0-3 4-6 7-25	-- -- --	5.7 -- --	5.7 -- --	-- -- --	-- 5.7 3.0	-- 5.7 3.0
II. ON-SITE WELLS								
A. W23	Reilly will pay the cost of converting W23 to a 50 gpm Prairie du Chien-Jordan pumpout well, with discharge to the sanitary sewer (untreated). City will pay operating costs for 10 years.	0 0-10	30 --	-- --	-- --	-- --	-- 24	-- 27.5
B. W105	Reilly will pay to core quickly to the bottom of W105 to confirm the expectation that remainder of well is clean and then to convert W105 to a monitoring well, if this can be done at a reasonable cost (as shown). If not, the well should be sealed because the monitoring data would not be that valuable technically. Further bailing of W105 is unnecessary because of contingency item IX.A for the Mt. Simon-Hinckley.	0	20	--	--	--	--	--